



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

June 5, 2009

Mr. Thomas D. Gallacher, Director
SSFL – Safety, Health & Environmental Affairs
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

COMMENTS AND REQUIREMENTS RELATED TO THE FINAL INTERIM SOURCE REMOVAL ACTION WORK PLAN SUBMITTED IN RESPONSE TO CALIFORNIA WATER CODE SECTION 13304 ORDER – THE BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)

Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the May 2009 *Final Interim Source Removal Action (ISRA) Work Plan Santa Susana Field Laboratory, Ventura County, California* (Final Work Plan) that was submitted to the Regional Board on May 1, 2009. The Work Plan was submitted in response to the California Water Code section 13304 Order, dated December 3, 2008, (Order) issued to Boeing by the Regional Board. Regional Board staff conditionally approved the approach and commented on the February 2009 *Preliminary Interim Source Removal Action (ISRA) Workplan Santa Susana Field Laboratory, Ventura County, California* in a letter dated April 20, 2009. The Final Work Plan provides additional details for source removal in outfalls 008 and 009, and addresses the comments in the April 20, 2009 Regional Board letter.

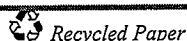
The Regional Board's April 20, 2009 letter required that, by May 1, 2009, Boeing:

- 1) Identify the approach for preventing contaminants in any soil excavated or otherwise disturbed while implementing the cleanup from being mobilized during wind or rain events.
- 2) Discuss how the responsible parties, Boeing and NASA, will coordinate responsibilities and cleanup of the watersheds related to outfalls 008 and 009.
- 3) All documents related to compliance with the December 3, 2008 Order must be posted on the internet concurrent with submittal to the Regional Board.

Requirement 1 was adequately addressed in the Final Work Plan section 6.2 (Erosion Control). Requirement 2 was not adequately addressed, and requirement 3 was modified in a Regional Board May 22, letter, approving Boeing's request for a 10 day window to upload documents to the Boeing surface water website.

The Regional Board has the following comments specific to the Final Work Plan:

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

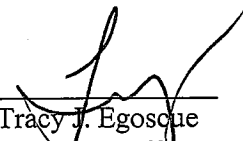
June 3, 2009

- 1) The statement that NASA has funding constraints appears in several places in the document. Please clarify the significance of these constraints. Do they have the potential to significantly influence the project schedule?
- 2) Based on Figure 3-1, the area with the highest copper and lead concentrations in soil in the outfall 008 area appears to have been excavated during the perchlorate cleanup. Please explain the need to re-excavate this area.
- 3) It is indicated in Appendix B that rainfall runoff carries approximately 1000 tons of soil through outfall 008 each year. Based on field measurements, verify the reasonableness of this estimate.
- 4) Section 5-5, "Confirmation Soil Sampling" indicates that samples will be collected at "varying depths." Staff understands that samples will be collected at a range of depths below the surface of the excavation. Please clarify the proposed sampling depths in the Final Work Plan.
- 5) The sequence of source cleanups in the watersheds for outfalls 008 and 009 is not clear in the Final Work Plan. The schedule of the NASA work in the eastern 009 area is not well integrated into the overall schedule discussion. The Final Work Plan shall include a combined schedule with both NASA and non-NASA work and also include a chart that indicates the organizational responsibilities for each area cleanup task.
- 6) The Final Work Plan does not adequately describe radiological monitoring during the cleanup. Monitoring for radiological contamination is an important activity being conducted during soil excavation. The details of radiological screening shall be clearly presented in the Final Work Plan.

No later than **June 19, 2009**, Boeing shall provide the Regional Board with your responses to these comments. As appropriate, the responses are to be made in an addendum to the Final Work Plan or as changes to the text of the Final Work Plan. These requirements are made under the Regional Board's California Water Code section 13304 Order, dated December 3, 2008.

Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at praftery@waterboards.ca.gov if you have any questions.

Sincerely,



Tracy J. Egosque
Executive Officer

cc: Honorable Alex Padilla, Senator 20th District
Honorable Fran Pavley, Senator, 23rd District

California Environmental Protection Agency



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cc list continued

Honorable Tony Strickland, Senator 19th District
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Mr. Damon Wing, c/o Ms. Linda Parks, Ventura County Board of Supervisors
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Mr. Dan Hirsch, Committee to Bridge the Gap
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Environmental Protection Agency, Region 9, Office of Radiation Programs
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Friends of the Los Angeles River
Los Angeles and San Gabriel Rivers Watershed Council
Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works, Environmental Programs Division
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NOAA, National Marine Fisheries Service
Simi Valley Library
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U.S. Army Corps of Engineers
ULARA Watermaster
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